

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Interconnection and Resale Obligations)	WT Docket No. 98-100
Pertaining to)	
Commercial Mobile Radio Services)	CC Docket No. 94-54

REPLY COMMENTS OF MCI WORLDCOM INC.

MCI WorldCom, Inc. ("MCI WorldCom") files these comments in reply to the Oppositions submitted to the Petition for Further Reconsideration in the above-captioned proceeding.¹ Six parties filed oppositions² to MCI WorldCom's petition asking the Federal Communications Commission ("Commission") to (i) ameliorate the effects of its plan to sunset mandatory wireless resale on November 24, 2002, and (ii) delay the sunset of mandatory wireless resale until one full year after implementation of local number portability ("LNP") by wireless carriers. Commenters downplayed the very real and historical concerns raised by MCI WorldCom regarding wireless LNP deployment, and argued that the MCI WorldCom filing engaged in speculation about stranded customers. Commenters did not, however, offer any concrete evidence that MCI WorldCom was incorrect in its assertions.

¹Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, WT Docket 98-100, CC Docket No. 94-54, Petition for Further Reconsideration filed by MCI WorldCom December 9, 1999 ("Petition").

Significantly, not one wireless carrier or association on behalf of any of its members stated that it would continue to offer wireless service to resellers after the November 24, 2002 sunset date for mandatory resale.

First, contrary to some of the comments, MCI WorldCom is not trying to address wireless LNP implementation issues on a stand-alone basis in this docket, nor is MCI WorldCom seeking to have the Commission bring forward the wireless LNP date from November 24, 2002. That issue has already been decided. However, it cannot be denied that the wireless LNP implementation deadline has been extended twice already, nor can it be denied that interest remains high among wireless carriers in abandoning that obligation completely. Without wireless LNP and mandatory resale, customers of wireless resellers could be left hanging in the balance.

Second, history demonstrates the continued effort by wireless interests to rid themselves of LNP obligations. For example, GTE Service Corp. filed a petition for reconsideration on May 27, 1999, even after the Commission had already granted two wireless LNP delays, contending that the Commission should have forbore completely from adopting wireless LNP requirements.³ Without the ability to transfer customers from one carrier to another via wireless LNP, the risk remains very real to every reseller, regardless of size, that its customers will be stranded and/or the former underlying carrier will enjoy a windfall by signing up the reseller's customers who are unwilling to change their telephone numbers.

²Parties filing Oppositions were Cellular Telecommunications Industry Association, SBC Wireless Inc., BellSouth Corp., GTE Service Corp., U S West Wireless, LLC and the Personal Communications Industry Association.

³ In the Matter of Cellular Telecommunications Industry Association's Petition for Forbearance from Commercial Mobile Radio Services Number Portability Obligations and Telephone Number Portability, WT Docket No. 98-229, CC Docket No. 95-116, Memorandum Opinion and Order, GTE Service Corp. Petition for Reconsideration, filed May 27, 1999.

MCI WorldCom would like to set the record straight regarding the following allegation made by SBC Wireless Inc.:

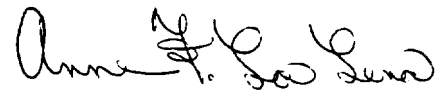
“Reseller customer bases are sold today from one reseller to another (and sometimes even to the underlying carrier) without the necessity of a change of telephone numbers by the customer. In fact, MCI itself recently purchased such a group of customers in Michigan City, Indiana. Such customers were not required to change their telephone number.”⁴

Those customers were not required to change numbers because the underlying carrier remained the same. It would have been a far different situation if MCI WorldCom wanted to move those customers to another carrier’s network. If those customers wanted to keep the same telephone numbers, they would have had to terminate their arrangement with MCI WorldCom and migrate to the underlying carrier. The problem occurs when the underlying carrier terminates its resale offering and resellers must find another underlying carrier (if any) to which customers can be transferred.

⁴ See SBC Wireless Inc. Comments, at 3.

In conclusion, MCI WorldCom urges the Commission to defer the mandatory resale sunset date (now set for November 24, 2002) until one full year after successful national LNP implementation for wireless carriers. By so doing, the Commission will ensure that resellers continue to play a significant role in maximizing competitive wireless services to all customer markets, urban and rural.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Anne F. La Lena".

Anne F. La Lena
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March 15, 2000

CERTIFICATE OF SERVICE

I Billie Rickert hereby certify that a copy of the foregoing Petition For Declaratory Ruling of MCI WorldCom, Inc. was served by Hand Delivery (indicated by *) or U.S. First Class mail, this 15th day of March, 2000 on:

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